

MICHAEL McKNEELY (State Bar No. 214896)
2300 Tulare Street, Suite 115
Fresno, California 93721
Telephone: (559) 443-7442
Facsimile: (559) 860-0150
mike@fresnocriminalattorney.com

Attorney for Defendant
SANDRA CORONADO DIAZ

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

MARIO ROJO-ALANIZ, et al,

Defendants.

Case No. 1:20-CR-00174-DAD-BAM

**STIPULATION TO CONTINUE CHANGE
OF PLEA HEARING; ORDER**

Date: March 14, 2022

Time: 9:00 a.m.

Hon. Dale A. Drozd

STIPULATION

1. The United States of America, by and through PHILLIP A. TALBERT, United States Attorney, and KATHERINE E. SCHUH, Assistant United States Attorney, and Defendant, SANDRA CORONADO DIAZ, by and through her counsel of record, Michael McKneely, hereby stipulate as follows.

2. The parties have reached a plea agreement in this case.

3. The parties request to continue the change of plea hearing in this case from March 14, 2022 to March 21, 2022 at 9:00 a.m. before the Honorable Dale A. Drozd.

4. The parties further believe that time should be excluded to allow the defendant to prepare to enter change of plea. Failure to grant the request would unreasonably deny both the defendants and the government the reasonable time necessary for effective preparation, taking into account the parties' due diligence in

1 prosecuting this case. 18 U.S.C. Section 3161(h)(7)(B)(iv). Based on the above-stated
2 findings, the ends of justice served by the schedule as requested outweigh the interest of
3 the public and the defendant in a trial within the original date prescribed by the Speedy
4 Trial Act. Therefore, the parties request that the Court exclude the time through
5 March 21, 2022 from calculations under the Speedy Trial Act.

6
7 IT IS SO STIPULATED.

8
9 DATED: March 11, 2021

MICHAEL McKNEELY,
CRIMINAL DEFENSE ATTORNEY

10
11 By: /s/ Michael McKneely
Michael McKneely
Attorneys for Sandra Coronado Diaz

12
13 DATED: March 11, 2021

PHILLIP A. TALBERT
United States Attorney

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15 By: /s/ Katherine E. Schuh
KATHERINE E. SCHUH
Assistant United States Attorney

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17
18 **ORDER**

19 Pursuant to the parties' stipulation the change of plea hearing in this case
20 is hereby continued from March 14, 2022 to March 21, 2022 at 9:00 a.m. Time is
21 excluded to the new date of March 21, 2022.

22 IT IS SO ORDERED.

23
24 Dated: March 11, 2022


UNITED STATES DISTRICT JUDGE

MICHAEL McKNEELY
CRIMINAL DEFENSE ATTORNEY
2300 TULARE STREET, SUITE 115
FRESNO, CALIFORNIA 93721
TELEPHONE: (559) 443-7442
FACSIMILE: (559) 860-0150